



**Clear Channel Outdoor Holdings, Inc**

**ETHICAL SUPPLY CHAIN STATEMENT**

**(incorporating [Clear Channel International Limited](#), [Clear Channel Norway AS](#) and [Clear Channel UK Limited's MODERN SLAVERY STATEMENT](#))**

**June 2024**

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## INTRODUCTION

The United Kingdom Modern Slavery Act came into effect in October 2015. This Act requires commercial organisations doing business in the UK that supply goods or services and have an annual turnover exceeding £36 million to publish an annual statement addressing the measures taken to mitigate the risk of modern slavery.

The Norwegian Transparency Act came into effect in July 2022. This Act requires commercial organisations with over 70 MNOK in sales revenue, and over 35 MNOK on the balance sheet implement and account for human rights due diligence in their operations, supply chain, and the use and disposal of their products and services.

This Ethical Supply Chain statement (this “**Statement**”) summarises steps taken by Clear Channel Outdoor Holdings, Inc (“**Clear Channel**”) to eradicate modern slavery in its operations and supply chains. This Statement applies to Clear Channel Outdoor Holdings and its wholly owned subsidiaries doing business in the UK and Norway, including Clear Channel International Ltd, Clear Channel Norway AS and Clear Channel UK Limited.

Please send any written requests for information on this Statement to [Compliance@clearchannel.com](mailto:Compliance@clearchannel.com) and your request shall be responded to within the timeframes set out in applicable law.

## OUR STATEMENT

Clear Channel is one of the world’s leading Out of Home advertising companies, with a diverse portfolio of print and digital displays in countries across the US, Europe and Latin America. We help advertisers create inspiring out-of-home campaigns via traditional and digital display formats in roadside, urban, transit and airport environments, on street furniture and at retail near point of sale. As part of our ESG mission “**Creating a Better World through our People-Powered Platform**”, we believe we have an obligation to help address critical issues affecting the communities we serve.

Clear Channel has a zero-tolerance approach to human rights abuses. As a leading global media company, we take the working conditions of our employees, contractors, temporary workers, sub-contractors and those of workers in our supply chain very seriously.

## OUR PUBLIC COMMITMENTS

1. Clear Channel has been a signatory to the UN Global Compact since 2021;
2. Clear Channel has published an annual ESG Report since November 2021 detailing our commitments to all ESG matters, including social justice available here <https://clearchannel.widen.net/s/5k2xvkv7xn>; and
3. Clear Channel engages with workers’ associations regularly where they exist in our markets/countries.

## OUR OVERSIGHT

Environmental, Social and Governance matters including human rights policies and procedures are overseen by the Clear Channel Board’s Nominating and Governance Committee pursuant to the

committee's Charter and as further set out in our Proxy Statement. Risk, including in relation to ESG matters, is overseen by the Audit Committee.

Executive oversight of our regional ESG programmes is coordinated by the Global Compliance Office in cooperation with stakeholders in Strategy, Communications & Marketing, Business Development, Product, Procurement, HR, Legal, Finance, Operations and Internal Audit.

## OUR POLICIES

Clear Channel continues to take steps towards ensuring our supply chain provides fair working conditions in accordance with those International Labour Organisation standards ratified in each market/country in which we operate, and with reference including but not limited to the UN Guiding Principles on Business and Human Rights, the UN Global Compact and the Base Code of the Ethical Trading Initiative:

1. our **Company Values** (which vary by division) include Fairness and Integrity, which (i) have ethics as the bottom line and (ii) require that our people seek opportunities to take ownership of challenges and provide ethical solutions;
2. our **Code of Business Ethics and Conduct** sets out Clear Channel's approach to a healthy working environment for its own staff and contractors who work with Clear Channel;
3. our **Human Rights Policy** has been developed with reference to the UN's Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work, and includes provisions on human trafficking and modern slavery, freedom of association and collective bargaining; and
4. our **Human Resources policies** vary by market/country, but include compliance with local employment legislation. We conduct appropriate background checks including relating to identity and eligibility to work in the jurisdiction in which they are employed.

## OUR SUPPLY CHAIN

Clear Channel works with numerous suppliers globally and locally<sup>1</sup>. We seek to ensure that our agreements with third parties require them to comply with applicable human rights, modern slavery and labour laws and we do not knowingly contract with suppliers engaged in any practice of child labour or human trafficking. Our risk assessment varies depending on the products and services we purchase, and the regions in which we procure those products and services:

1. our **Supplier Code of Conduct**, developed with reference to the UN's Universal Declaration of Human Rights and The International Labour Organisation Declaration on Fundamental Principles and Rights at Work, sets out our approach to a healthy working environment for key suppliers which work with our international divisions;
2. our **Procurement policies and procedures** include tailored due diligence and appropriate technical, financial and commercial standards.
3. our **Supplier framework agreements** include clauses imposing specific requirements in relation to legal obligations, including where appropriate the UK Modern Slavery Act or the US Uighur Forced Labor Prevention Act; and
4. we undertake internal audits with site inspections of key suppliers on an ongoing basis, including reviews of workers' working conditions, health and safety, and other Compliance risk.

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<sup>1</sup> For example, Clear Channel UK invests in local British small and medium enterprises through our supply chain, with 85% of our annual procurement spend remaining in the UK, half of which goes to small and medium enterprises.

## OUR COMMUNITY OUTREACH AND PARTNER CHARITABLE SUPPORT

Clear Channel continues to promote ethical Corporate Social Responsibility messages across our media (under our ESG mission statement of “**Creating a Better World through our People-Powered Platform**” and our European and UK initiative of “**Platform for Good**”), including messages aimed to help combat modern slavery.

Since 2012 we have run human trafficking awareness programs with partners across the US and Europe, including Polaris, Tatlita, the McCain Institute and the Texas governors’ office, Ruhama and A21 with campaigns on strategically located billboards designed to educate the public on the true scale and impact to victims of human trafficking; to recognize indicators of human trafficking, and report suspected scenarios; and to drive calls to human trafficking hotlines, including tips and requests by victims for help.

In 2024, Clear Channel Ireland ran a number of campaigns as part of their charity partnerships initiative. One of these displays was for the charity, Ruhama, helping to fight human trafficking for sexual exploitation.

Furthermore, Clear Channel continuously promotes other areas of human rights and wellbeing through several campaigns, for example:

1. Clear Channel Europe continues to prioritise donations of billboard space to those charities advancing the UN Sustainable Development Goals, as part of CC Europe’s Platform for Good initiative;
2. Clear Channel Belgium partnered with Amnesty International and Plan International in 2023 in a campaign promoting human rights;
3. In 2023, Clear Channel UK have partnered with Scope, supporting their ‘Cost of Breathing’ campaign. The billboard campaign promotes how the charity can help individuals who rely on moving, speaking and breathing apparatus;
4. Clear Channel UK donated billboard space in 2023 to the SPOT Project, the UK scheme focused on supporting people struggling with the cost of living crisis, particularly children from low income backgrounds; and
5. In 2023, CCOA partnered with the Sacramento District Attorney’s Office to promote GetHelpSac.org, an app to connect people experiencing domestic abuse with social services.
6. In 2024, Clear Channel Netherlands ran a campaign, Vergeten Kind, with the non-profit organisation Het Vergeten Kind to help vulnerable children who have been neglected or mistreated.
7. Clear Channel UK’s campaign across East London with Rise 365 provided free advertising space to raise awareness of child abuse.
8. Clear Channel Latvia have supported the Dardedze campaign. Dardedze is a non-governmental organisation advocating for every child having a safe childhood. Clear Channel Latvia released 4 different campaign materials to raise awareness of the signs of child sexual abuse and encourage them to seek help.

## GOING FORWARD

Clear Channel will continue to strengthen its approach to managing the risk of modern slavery by ensuring its strategy, training and risk awareness is responsive to changing risks, including by:

1. providing annual training on ethical conduct, mandatory for all employees;

2. providing key employees with an understanding of Compliance risks, including human rights abuses, in our senior executive onboarding and due diligence training, with further tailored training and guidance is communicated proportionate to risk; and
3. continuing to audit our key suppliers including in relation to human rights abuses;
4. maintaining an independent Hotline across all markets/countries for employees, suppliers and business partners to alert us to risks, including human rights abuses.

We will continue to monitor working conditions in our supply chain with particular focus on:

1. identifying low, medium and high risk areas and strengthening our work in the areas of greatest risk;
2. building a holistic approach that includes support for our business partners and suppliers where required; and
3. providing training for our internal teams, including relating to 'at-risk' relationships.

### RELATED DOCUMENTATION

Clear Channel Values and the Clear Channel Code of Business Conduct & Ethics, Human Rights Policy, Supplier Codes of Conduct, Supplier Framework Agreements, ESG Report and Clear Channel Terms and Conditions are available on request or, where applicable, on our websites.

Clear Channel is unaware of any ethical issues in its supply chain that contradict this Statement.

Signed by:..........

date:.....6/26/24.....

**Scott Wells**

**CEO and President**

**Clear Channel Outdoor Holdings, Inc.**